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Department of Energy

Richland Field Office

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94-RSD-021

Mr. Steve M. Alexander
Nuclear Waste Program
State of Washington State
Department of Ecology
1315 W. 4th Avenue
Kennewick, Washington 99336-6018

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Messrs. Alexander and Sherwood:

TRANSMITTAL OF INTERIM REMEDIAL MEASURES (IRM) PROPOSED PLANS FOR 100-DR-1,
100-HR-1, AND 100-HR-3 OPERABLE UNITS

Enclosed are copies of the following IRM Proposed Plans:

- DOE/RL-94-100, Proposed Plan for Interim Remedial Measures at the 100-R-1 Operable Unit, Draft A
- DOE/RL-94-101, Proposed Plan for Interim Remedial Measures at the 100-HR-1 Operable Unit, Draft A
- DOE/RL-94-102, Proposed Plan for Interim Remedial Measures at the 100-HR-3 Operable Unit, Draft A

These documents are being submitted in support of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestones M-15-07D, M-15-05D, and M-15-06D for 100-DR-1, 100-HR-1, and 100-HR-3 respectively. Additional copies of these documents were provided to your staff on September 27, 1994.

The objectives of the proposed plan are to inform the public of proposed remedial alternatives selected for implementation at the 100-DR-1, 100-HR-1, and 100-HR-3 Operable Units (OU), and to invite their comments on the selections. The proposed plans present, in simplified format, a summary of alternatives considered, associated risks, and rationale for selecting the preferred alternatives. The proposed plans are based on DOE/RL-92-11, 100 Area Feasibility Study, Phases 1 and 2, Rev. 0, DOE/RL-94-61, 100 Area Source Operable Unit Feasibility Study Report, Draft A, and Draft A of OU-specific focused feasibility study reports for 100-DR-1 (DOE/RL-94-64), 100-HR-1 (DOE/RL-94-63), and 100-HR-3 (DOE/RL-94-67), all of which are being submitted concurrent with the IRM Proposed Plans.



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While the Proposed Plans were being prepared, several comments were provided by U.S. Environmental Protection Agency (EPA) staff during a Record of Decision Working Group meeting held on August 30, 1994. Responses to the EPA comments have been incorporated into the IRM Proposed Plans except as follows:

- Low Priority Sites: A request was made to address remediation of low priority waste sites in the IRM Proposed Plan. Low priority sites are identified in the IRM Proposed Plans, but remediation of these sites is not addressed. These sites are planned to be addressed in future 100 Area Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documentation.
- Contaminant Exposure Pathways: A request was made to evaluate residential exposure pathways. In response, a "Sensitivity Analysis" has been initiated to evaluate the feasibility and costs of remedial alternatives for a residential-based exposure scenario as compared to the current recreational-based exposure scenario. An oral presentation to the regulators highlighting key results is tentatively planned for mid-October 1994. A draft document for regulatory review will be issued subsequent to the presentation.
- Interim Action: A request was made to eliminate the label "interim" when characterizing the proposed remedial actions. At present the IRM Proposed Plans are prepared in accordance with Hanford Past Practice Strategy. The goal of the Hanford Past Practice Strategy is to streamline the remedial action process, through expedited response actions (ERA) and IRMs. The language has been retained in the documents.
- EPA indicated that information characterizing the nine EPA alternative evaluation criteria would be provided for inclusion in Draft A of the Proposed Plans. The information was not received and the discussion was not revised.

The attached IRM Proposed Plans are the first such documents for 100 Area IRM sites to be offered for regulatory review. As such, we consider these documents to be "strawmen," in the sense that they represent a starting point for inviting comments and opening discussions concerning the content of IRM Proposed Plans for 100 Area operable units.

Discussions at the ROD Working Group meeting held on September 27, 1994, ended in agreement that the 100-HR-1 IRM Proposed Plan would be used as a template for the 3 agencies to use in revising these proposed plans to support the recent regulatory ROD strategy agreed to by your agencies. It is our understanding that this agreement will result in a phased approach for Interim RODs, with the first phase consisting of liquid disposal sites. A meeting to begin this revision is set for October 11, 1994.

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We look forward to working with you and your staff to assure that these plans meet regulatory and public expectations and facilitate remediation of the 100 Areas in an expeditious manner.

If you have any questions, please contact the individual Project Managers, Mr. K. Michael Thompson on 373-0750 (100-HR-3) or Ms. Nancy Werdel on 376-5500 (100-HR-1 and 100-DR-1).

Sincerely,

Robert S. Holt

Robert G. Holt
Acting Hanford Project Manager

RSD:NAW

Enclosures: As stated

cc w/o encls:

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